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Via Electronic Filing

Hon. Magistrate Judge William D. Wall
United States District Court
Eastern District of New York
100 Federal Plaza, Courtroom 820
P.O. Box 9014
Central Islip, New York 11722

Re: Spector Group 11, LLP v. Transportation Insurance Co., *et al.*
– Index No.: CV 12-3081

Dear Judge Wall:

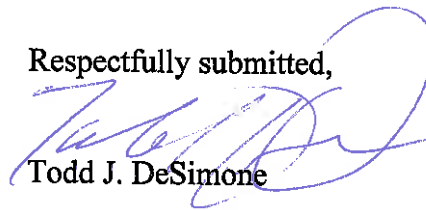
We serve as counsel to Plaintiff, Spector Group 11, LLP (“Spector”), in the above-referenced matter. Please allow this communication to serve as Spector’s request, pursuant to Local Civil Rules 37.1 and 37.3, for a one-week extension of Spector’s time to oppose defendant, Transportation Insurance Company’s (“TIC”), and intervenor defendant, Continental Casualty Company’s (“CCC”) (TIC and CCC are sometimes collectively referred to as, the “Defendants”) motion to join third-party defendant Iron Shore Indemnity, Incorporated (“Iron Shore”). We have conferred with Intervenor Plaintiff SG Design Build LLC and it also requests a one-week extension to oppose Defendants’ motion to intervene.

Spector’s current date to oppose Defendants’ motion to intervene is Monday, February 24, 2014. In February 2014, Iron Shore retained counsel, Sheldon Karasik, P.C., to respond to a subpoena served by Defendants upon Iron Shore. Counsel for Iron Shore has expressed interest in assisting Spector in opposing Defendants’ motion to intervene. On February 20, 2014, I contacted counsel for Defendants by email and requested a one-week extension of time to oppose their motion to intervene so that new counsel for Iron Shore could have the opportunity to review the case and offer its assistance in drafting opposition papers. Counsel for Defendants has refused to grant Spector the courtesy of the one-week extension, merely citing that “in light of the trial date, TIC and CCC cannot agree to the extension.” The parties are currently scheduled to pick a jury for the trial of this matter on July 21, 2014. Spector does not believe a one-week extension in order to oppose Defendants’ motion to intervene will affect the discovery in this matter or the trial.

For the above reasons, we respectfully request that the Court grant Spector and SG Design Build LLC a one-week extension up to and including March 3, 2014 to oppose Defendants’ motion to intervene. Thank you in advance of your consideration of our request.

Hon. Judge William D. Wall
February 21, 2014
Page 2 of 2

Respectfully submitted,



Todd J. DeSimone

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